

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MICHIGAN**

CLARITY SPORTS INTERNATIONAL)	
LLC and JASON BERNSTEIN,)	
)	
Petitioners,)	
v.)	No. 2:20-mc-5484
)	
KENNY GOLLADAY,)	Arising from Civil Action No.
)	1:19-cv-305-YK, pending in
Respondent.)	the United States District Court
)	For the Middle District of
)	Pennsylvania

DECLARATION OF JOHN D. COMERFORD

Under 28 U.S.C. § 1746, the undersigned states as follows:

1. My name is John D. Comerford. I am over the age of 18, am competent to furnish this Declaration, and do so based upon my personal knowledge of the statements made herein. I am an attorney licensed to practice law in the states of Missouri and Illinois. I am a partner with the law firm Dowd Bennett LLP, which is counsel to Petitioners Clarity Sports International, LLC and Jason Bernstein. I have personal knowledge of the facts in this declaration, and, if called to testify as a witness, I would testify under oath to these facts.

2. Respondent Kenny Golladay is a player in the National Football League. My client, Jason Bernstein, represented Golladay as his Registered Contract Advisor (or “agent”) until January, 2019. Clarity Sports International is Mr.

Bernstein's sports agency; it worked under an exclusive marketing agreement with Golladay until January, 2019.

3. Based on my clients' records and past correspondence with Golladay, and based on documents produced in discovery in the underlying litigation pending in the United States District Court for the Middle District of Pennsylvania, Petitioners have a record of Respondent Kenny Golladay's residential address in the Detroit, Michigan area.

4. Attempts to effectuate personal service on Golladay at the residential address in Petitioners' records were unsuccessful, and my current understanding is that Golladay no longer resides at that address.

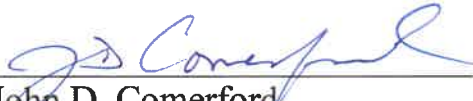
5. Also based on my clients' records and documents produced in discovery, Golladay regularly communicated and conducted business with Petitioners, as well as with at least one of the defendants in the underlying action, via his two email accounts. One is a "gmail.com" account and the other is a "yahoo.com" account.

6. I have personally sent email messages to Golladay at the two email addresses that Golladay has used to communicate and conduct business with Petitioners and at least one of the defendants. I asked Golladay to agree to accept service by email of our Motion to Enforce the Rule 45 subpoena. I also asked him if, alternatively, he would provide us with the name of an attorney that represents

him in this matter, if there is one, so we can correspond with that person. Finally, I asked that if he does not agree to accept service of the Motion, would he please provide his current home address so we may serve him there. I received no response.

7. None of the messages I have sent to Golladay's email addresses has been returned as undeliverable. Nor do I have any other reason to believe that those email addresses are inactive, invalid, or otherwise disassociated from Golladay.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.


John D. Comerford
Dated: December 17, 2020
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